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August 6, 2024

**Via ECF and Email**

The Honorable John P. Cronan  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Camacho v. American Express Company, No. 1:24-cv-02408-JPC (S.D.N.Y.)

Dear Judge Cronan:

I represent Plaintiff in the above action. I write to inform the Court of Plaintiff's intent to file a First Amended Complaint for which Plaintiff has obtained Defendant's written consent under Fed. R. Civ. P. 15(a)(2).

Plaintiff's initial complaint was filed on March 29, 2024. ECF No. 1. Defendant filed its motion to dismiss on July 12, 2024. ECF No. 14. Plaintiff's opposition is currently due on August 12, 2024. Plaintiff believes the issues presented in Defendant's motion to dismiss can be narrowed through amendment. No new causes of action will be added. Accordingly, the parties have conferred and jointly propose the below case deadlines:

- First Amended Complaint Due: **September 11, 2024**
- Motion to Dismiss Due: **October 28, 2024**
- Opposition to Motion to Dismiss Due: **December 11, 2024**
- Reply in Support of Motion to Dismiss Due: **January 8, 2025.**

Thank you for your consideration.

Very truly yours,



Joshua D. Arisohn

cc: all counsel of record (via ECF)

The Court adopts the proposed briefing schedule, as that schedule is amenable to the parties. Plaintiff shall file the First Amended Complaint on or before September 11, 2024. Defendant's motion to dismiss and accompanying briefing is due on or before October 28, 2024, Plaintiff's opposition is due on or before December 11, 2024, and Defendant's reply, if any, is due on January 8, 2025. Defendant's motion to dismiss the original Complaint, Dkt. 13, is denied as moot. The Clerk of the Court is respectfully directed to close the motion pending at Docket Number 13.

SO ORDERED.

Date: August 8, 2024  
New York, New York

A handwritten signature in black ink, appearing to read "John P. Cronan", written over a horizontal line.

JOHN P. CRONAN  
United States District Judge